



STATE OF MAINE
COMMISSION ON GOVERNMENTAL ETHICS
AND ELECTION PRACTICES
135 STATE HOUSE STATION
AUGUSTA, MAINE
04333-0135

ADDITIONAL MATERIALS

Item #5

January 25, 2012

To: Commissioners

From: Jonathan Wayne, Executive Director

Date: January 24, 2012

Re: Request to Investigate Pro-Casino PACs.

This is to update on you on two developments concerning the complaint of Casinos *NO!* against the Lewiston casino PACs.

Attached Letter

At the end of the business day yesterday, the Commission received the attached letter from Mark L. Walker, an attorney for the PACs. In the letter, Mr. Walker states:

It was Mr. Mendros' and Mr. Robinson's understanding that GT Source was the original source of funds for this campaign, and they are not aware of any other sources of funding.

The PACs are declining to identify anyone associated with Dome Messaging or their contact information, other than an e-mail address.

New Factual Explanation

Today, Peter Robinson and Mr. Walker stopped by our office, and conveyed some new information that was not included in the PACs' written submissions.

Mr. Robinson explained that the Green Jobs for ME PAC received the following sums from M Five, Inc.

Contributions from GT Source Reported by Green Jobs for ME	
08/12/11	\$5,000.00
09/01/11	\$2,200.00
09/22/11	\$26,000.00

His understanding has been that GT Source Corporation provided the funding to M Five, Inc. for these three political contributions, so Mr. Robinson reported the contributor as GT Source corporation, based on the advice he had received previously from Cindy Sullivan.

With respect to the campaign services provided by Dome Messaging to People of Lewiston and Auburn Committee, Mr. Robinson stated that Stravros Mendros, as the campaign manager, authorized all of the campaign services but GT Source Corporation paid Dome Messaging directly for the services.

So, the following contributions reported by People of Lewiston and Auburn Committee were not actually received the PAC. Rather, according to Mr. Robinson, they were sums that GT Source Corporation paid directly to Dome Messaging:

Contributions from GT Source Reported by People of Lewiston and Auburn Committee	
10/13/2011	\$25,000.00
10/13/2011	\$140,000.00
10/18/2011	\$160,000.00
10/26/2011	\$53,419.73

Documents Submitted

Mr. Robinson submitted the attached documents as a partial response to my January 13, 2012 request. The Commission staff has redacted the personal e-mail addresses of Peter Robinson and Stavros Mendros at the request of the PACs.

Thank you for your consideration of this memo.

January 25, 2012

RECEIVED

JAN 23 2012

Maine Ethics Commission

January 23, 2012

Jonathan Wayne, Executive Director
Commission on Governmental Ethics and Election Practices
135 State House Station
Augusta, Maine 04333-0135

RE: Response to January 13, 2012 letter regarding Lewiston Casino Referendum

Dear Mr. Wayne;

This letter responds to your two new requests, Questions 14 and 15, regarding reporting by the two PACs formed to pass Question 3, to allow a Casino in Lewiston. I am responding for Stavros Mendros, Manager, Green Jobs for ME and for Peter D. Robinson, Treasurer, Green Jobs for ME.

Question #14. Identify the individual at Dome Messaging who is most knowledgeable about the services it rendered to the PACs, along with that person's mailing address and phone number.

Both PACs and the campaign were managed by Stavros Mendros and he was the contact to Dome Messaging. He was told by Dome to use the following email address when sending and receiving information including invoices: Info@DomeMessaging.com

If the issue was whether Dome spent the money, or spent more money than was reported, please recognize that most of the funds were used to purchase media time, and federal law requires the contact information be provided by the media buyer. This information is public, and available through the various media outlets in Maine. Mr. Bailey knows this, and should not seek a State Agency to investigate information readily available to the public.

Question #15 To the best of your (both Mr. Mendros and Mr. Robinson) knowledge, did GT Source Corporation receive funds from any other source in order to make contributions to the PAC or to reimburse GT Source for the contributions it made to the PACs? If so, please identify those other sources and the amounts which GT Source received.

NO. It was Mr. Mendros' and Mr. Robinson's understanding that GT Source was the original source of funds for this campaign, and they are not aware of any other sources of funding. Per Mr. Robinson's answers to the prior questions, he contacted Cindy Sullivan at the Ethics Commission on multiple occasions and attempted to the best of his ability to file accurate, compliant reports.

There were no "mysterious" sources of additional funding for this Referendum. This was a campaign attempting to assist with economic development in downtown Lewiston, with the support of their City Council and local economic development organizations. GT Source was the only outside major contributor and was the original source of the vast majority of campaign funding. As your analysis indicated, the only other contributors were the funds from the original investors in Great Falls Development.

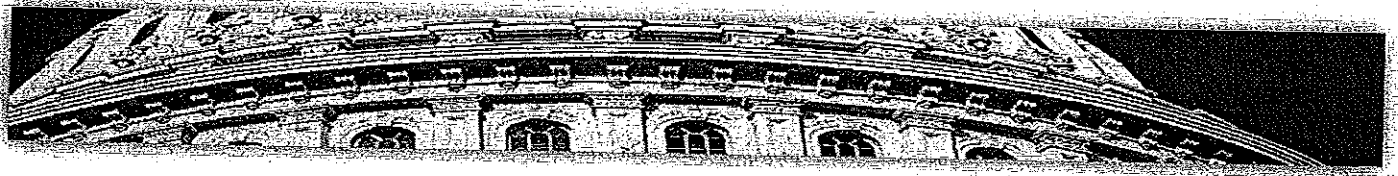
Mr. Mendros and Mr. Robinson are working on more complete responses to questions 1 – 4. They will provide documentation as requested by your Commission. Gathering this information is difficult and has been time consuming. I expect to hand deliver some if not all requested information by tomorrow morning, January 24th. Making this response more difficult was the unavailability of Mr. Mendros, the Campaign's manager who had some of this information, as he was out of the country for much of the time between Mr. Robinson's January 13th letter, and earlier this week.

Thank you for the opportunity to address the Complaint filed against the PACs by CasinosNo. We look forward to the January 25th Commissioners meeting.

Sincerely,

Mark L. Walker, Esq.
Law Office of Mark L. Walker
226 Water St.
Hallowell, Maine 04347

207-621-8188 (Office)



DOME MESSAGING

WWW.DOMEMESSAGING.COM

INVOICE

0010

9/21/11

GREEN JOBS FOR ME PAC
PO Box 641
Lewiston, ME 04243

DUE ON RECEIPT

ITEM	NET DUE
Planning fees for September 2011	7500.00
Statewide survey (poll)	16000.00

TOTAL \$ 23500.00

Payable by wire with instructions provided or to address below. Please note address below for campaign finance reporting purposes and item descriptions above.

2776 S. ARLINGTON MILL DR • SUITE # 136 • ARLINGTON, VA 22206

From: Dome Messaging [mailto:information@domemessaging.com]
Sent: Tuesday, October 25, 2011 10:48 AM
To: 'Peter Robinson'
Subject: RE: PAC Report

Peter, for reporting here are our expenses and dates when payments were made:

10/13/2011	Street signs	\$15,579.00
10/13/2011	Printed Cards	\$6,801.00
10/13/2011	Media Production	\$5,882.00
10/13/2011	Data purchase	\$4,600.00
10/13/2011	Television Airtime	\$33,420.00
10/18/2011	Cable Television Purchase	\$42,684.00
10/20/2011	Television Airtime	\$60,510.00
10/25/2011	Planning Fees	\$10,000.00

From: Dome Messaging [mailto:information@domemessaging.com]
Sent: Monday, October 31, 2011 11:09 AM
To: 'Peter Robinson'
Subject: RE: 24-hour reports

We are 100% aware

From: Peter Robinson
Sent: Monday, October 31, 2011 1:07 PM
To: 'Dome Messaging'
Subject: 24-hour reports

Just a reminder that any expenditures over \$500 need to be reported within 24 hours.

From: Dome Messaging [mailto:information@domemessaging.com]

Sent: Tuesday, November 01, 2011 9:55 AM

To: 'Peter Robinson'

Cc: 'Stavros J. Mendros'

Subject: expenditure

Peter, this is the first of what will be MANY expenditures. It is up to you if you want to file these individually or daily. I would probably suggest daily at like 4:15 PM each day.

\$739.101-NovAndroscoggin County

I would list this as PHONE SERVICES \$739.10

From: Peter Robinson
Sent: Thursday, November 03, 2011 8:43 AM
To: Dome Messaging
Subject: Re: huge reporting today

Just FYI, any expense incurred yesterday (Wednesday), regardless of the time of day, can be filed as late as 11:59 PM tonight. Any expense incurred today can be filed as late as 11:59 PM Friday night. I confirmed this with Cindy Sullivan in the Maine Ethics Commission office a few days ago, and she gave me the same answer she gave me last year, when I asked her the same question. Just FYI.

- Peter

-----Original Message-----

From: Dome Messaging
Sent: Nov 3, 2011 7:35 AM
To: 'Peter Robinson'
Subject: huge reporting today

Peter I am going to have some huge stuff for 24-reporting today!

One clump can go out today -- that should be filed around 3 PM based on the law.

Another clump can be filed tomorrow -- that can be filed late, late in the day. After 4 PM. Maybe 4:05.

From: Dome Messaging [mailto:information@domemessaging.com]

Sent: Thursday, November 03, 2011 3:33 PM

To: Peter Robinson

Subject: today's 24 PAC REPORT

For today's 24-Hour PAC report Peter please note the following was incurred yesterday afternoon from Dome Messaging.

2-Nov	Live Calls	\$45,130.66
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From: Dome Messaging [mailto:information@domemessaging.com]
Sent: Friday, November 04, 2011 10:08 AM
To: Peter Robinson

Subject: 24 report for Today -- Friday

For your 24 report for today, Friday. NOTE: you will need to confirm with your donors the incoming monies, etc from the PAC. Reminder, we are only reporting expenditures:

3-Nov	Television Airtime	\$44,645.00
3-Nov	Radio Airtime	\$64,504.94
3-Nov	Web Advertising	\$1,000.00
3-Nov	Radio Ad Production	\$660.00

DENNIS BAILEY LEFT OUT SEVERAL OF THESE ARTICLES WHICH ANSWER ALL OF THE QUESTIONS:

<http://www.sunjournal.com/city/story/1100963> -- "Barrett estimated that a casino developed by Great Falls Recreation and Redevelopment LLC and a to-be-named partner could bring 300 to 500 jobs"

<http://www.sunjournal.com/news/city/1112373> --- "We've planned all along to bring in other partners," Mendros said. "None of us has any experience running a casino, and we've never said or implied anything else. We'll need help, because that was the plan all along."

<http://www.mpbnet.com/News/YourVote2011/tabid/1134/ctl/ViewItem/mid/4020/ItemId/18773/Default.aspx> ---- "Dr. Ron Chicoine, one of the local investors, says his group has not signed a contract for any deal. As for making an offer, Chicoine had this to say: "Eventually we're going to be looking to work with professionals who know this business, but right now we have no signed contract with anybody. Any deals or offers we would make would be confidential and when they were completed, then we'd have two parties signing on it, you know?"

<http://www.sunjournal.com/news/city/0001/11/30/georgia-based-slot-machine-maker-helps-back-lewiston-casino-campaign/1104039> --- "Dwayne Graham, chief executive officer of GTSource Corp., a Kennesaw, Ga. company said Friday his company was helping finance the campaign because he liked the concept of revitalizing the mill and making the downtown more vibrant. Graham also said his company saw the proposed casino as a chance to sell machines in Maine. "That's what we would hope, it would be a new market for us to go into," Graham said. Graham said he hoped to help the campaign financially but said he wouldn't disclose how much. "We're looking to help out as much as we can, but I do have a limit and I'm not going to discuss what that is